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Via ECF & Hand Delivery

The request is denied. SO ORDERED - 10-29-15

The Honorable Paul A. Crotty,
United States District Court,
Southern District of New York,
500 Pearl Street, Room 735,
New York, New York 10007.



Paul A. Crotty, U.S.D.J

Re: In re Goldman Sachs Group, Inc. Securities
Litigation, Master File No. 1:10-cv-03461 (PAC)

Dear Judge Crotty:

I write on behalf of Defendants in the above-referenced consolidated action to request that the Court grant leave for Defendants to file a memorandum of law in support of their forthcoming motion for summary judgment of up to 35 pages. Defendants' motion is due November 6, 2015, Plaintiffs' opposition is due December 18, 2015, and Defendants' reply is due February 5, 2016. (See Dkt. No. 134 at 2-3.)

Defendants respectfully submit that permitting briefing ten pages beyond this Court's normal limit is appropriate for summary judgment motions in this action. The Court has certified a class of investors in common stock of The Goldman Sachs Group, Inc. covering a more than three-year period and potentially seeking billions of dollars in damages. The discovery record in this case is vast, including production of more than seven million pages of documents from parties and non-parties and 36 fact and expert depositions comprising thousands

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of pages of testimony and hundreds of exhibits. The parties have also exchanged 9 merits expert reports comprising more than 450 pages and dozens of exhibits. Defendants intend to file a single brief in support of summary judgment, notwithstanding that certain issues (such as scienter) will require separate presentations for different Defendants. Because Defendants intend to move for summary judgment on all claims, based on the extensive record in this case, they believe that an enlargement will benefit the Court's consideration of the issues presented in the motion.

Defendants respectfully propose a limit of 35 pages for their opening brief and Plaintiffs' opposition brief and 15 pages for Defendants' reply brief. Plaintiffs have informed us that they oppose any enlargement, but that if the Court grants the Defendants' requested enlargement, they would like an equal number of additional pages.

Respectfully submitted,



Richard H. Klapper

cc: James W. Johnson, Esq.
(Labaton Sucharow LLP)

Spencer A. Burkholz, Esq.
(Robbins Geller Rudman & Dowd LLP)